

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

<p>In re:</p> <p>LORI S BASCOME</p> <p>Debtor,</p> <p>THE BANK OF NEW YORK MELLON, F/K/A THE BANK OF NEW YORK AS TRUSTEE FOR REGISTERED HOLDERS OF CWABS, INC., ASSET-BACKED CERTIFICATES, SERIES 2005-1</p> <p>Movant,</p> <p>v.</p> <p>LORI S BASCOME, and WILLIAM C. MILLER, Chapter 13 Trustee</p> <p>Respondents.</p>	<p>Bankruptcy No. 19-11040-elf</p> <p>Chapter 13</p> <p>Document No. 47, 50</p>
--	---

STIPULATION RESOLVING MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes Movant, The Bank of New York Mellon, f/k/a the Bank of New York as Trustee for Registered Holders of CWABS, Inc., Asset-Backed Certificates, Series 2005-1 ("Movant"), by and through its undersigned counsel, Bernstein-Burkley, P.C., and, Debtor, Lori S. Bascome, by and through herundersigned counsel, Brad J. Sadek, Esquire, and together file this Stipulation Resolving Motion for Relief from the Automatic Stay and Co-Debtor Stay (the "Stipulation"), stating as follows:

1. The automatic stay as provided by Section 362 of the Bankruptcy Code shall remain in full force and effect conditioned upon the terms and conditions set forth herein.
2. Movant holds a Mortgage on the real property located at 201 Hansell Rd, Newtown Square, PA 19073-2508 (the "Property").
3. As of the date of this Stipulation, the Debtor is in default of her post-petition payment obligations to Movant in the amount of \$15,628.70.

4. Debtor will cure the post-petition arrears in the amount of \$15,628.70 through an Amended Chapter 13 Plan to be filed by Debtor and her Counsel. In order to resolving the pending the Objection, the parties agree as follows:

- a. Debtor shall have an Amended Chapter 13 Plan to provide for the \$15,628.70 in post-petition arrears filed within thirty (30) days of this Stipulation being approved by the Court.
- b. Debtor shall continue to make regular post-petition payments in the amount of \$3,122.84 outside the Chapter 13 plan beginning April 1, 2020 directly to Movant.
- c. The terms of this Stipulation shall be incorporated into the Debtor's confirmed Chapter 13 plan and any subsequent plan filed thereafter.
- d. The Bank of New York Mellon, f/k/a the Bank of New York as Trustee for Registered Holders of CWABS, Inc., Asset-Backed Certificates, Series 2005-1 shall be paid inside the Debtor's Chapter 13 Plan.
- e. Any conversion or dismissal of this case shall void the terms of the Stipulated order.

5. Debtors shall direct the payments to:

Carrington Mortgage Services, LLC, LLC
P.O. Box 3790
Anaheim, CA 92806

Payments must be received by Movant at the above-referenced address on or before the 1st day of each month. Debtors will be in default under the Stipulation in the event that Debtors fails to comply with the payment terms and conditions in Paragraph 4, *supra*. If Debtor defaults under this Stipulation, Movant may send Debtor and Debtor's counsel a Notice of Default. Debtor will have ten (10) days from the date of the Notice of Default to cure the default. If default is not cured after the ten days, a Certification of Default will be immediately filed with the Court by the Movant.

6. In the event the instant bankruptcy case is converted to a case under Chapter 7 of the Bankruptcy Code, the Debtors shall cure the pre-petition and post-petition arrears within ten (10) days


from the date of such conversion. Should Debtors fail to cure said arrears within the ten day period, such failure shall be deemed a default under the terms of this Stipulation Movant may serve a notice of default and intent to file Certification of Default but Debtors will not be granted an opportunity to cure the default. Instead, a Certification of Default will be immediately filed with the Court.

7. This Stipulation may only be modified by a revised Stipulation filed on the docket in the Bankruptcy. No oral modifications are permitted and any allegation that the Stipulation was modified orally will be disregarded as evidence. No written modifications are permitted, except for a revised Stipulation filed on the docket in the Bankruptcy.

Agreed to by:

By: /s/ Charles G. Wohlrab
Charles G. Wohlrab
Robertson, Anschutz, Schneid & Crane, LLC
PA I.D. 314532
10700 Abbott's Bridge Rd., Suite 170
Duluth, GA 30097
Telephone: 973-575-0707
Facsimile: 973-404-8886
Email: cwohlab@rascrane.com

*Counsel for The Bank of New York Mellon, f/k/a
the Bank of New York as Trustee for Registered
Holders of CWABS, Inc., Asset-Backed
Certificates, Series 2005-1*

By: /s/ 
Brad J. Sadek, Esq.
PA I.D. # 90488
brad@sadeklaw.com
1315 Walnut Street, Suite 502
Philadelphia, PA 19107
215-545-0008
Fax: 215-545-0611

Counsel for Lori S. Bascome

Dated: 07/15/2020

By: /s/ LeRoy W. Etheridge, Esq. for
William C. Miller
P.O. Box 1229
Philadelphia, PA 19105
215-627-1377
Chapter 13 Trustee

NO OBJECTION
*without prejudice to any
trustee rights and remedies.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: LORI S BASCOME Debtor, THE BANK OF NEW YORK MELLON, F/K/A THE BANK OF NEW YORK AS TRUSTEE FOR REGISTERED HOLDERS OF CWABS, INC., ASSET-BACKED CERTIFICATES, SERIES 2005-1, Movant, v. LORI S BASCOME, and WILLIAM C. MILLER, Chapter 13 Trustee Respondents.	Bankruptcy No. 19-11040-elf Chapter 13 Document No. 47, 50
---	--

Certificate of Service

I, the undersigned, certify under penalty of perjury that I am, and at all times hereinafter mentioned, was more than 18 years of age, that on the 19th day of August, 2020, I served a copy of the Stipulation Resolving Motion for Relief from Stay by first class U.S. Mail, postage prepaid or electronic mail at the following addresses:

Brad J. Sadek
Sadek and Cooper
1315 Walnut Street, Suite 502
Philadelphia, PA 19107

Lori S Bascome
201 Hansell Road
Newtown Square, PA 19073

WILLIAM C. MILLER, Esq.
Chapter 13 Trustee
P.O. Box 1229
Philadelphia, PA 19105

United States Trustee
Office of the U.S. Trustee
200 Chestnut Street, Suite 502
Philadelphia, PA 19106

By: /s/ Charles G. Wohlrab
Charles G. Wohlrab
Robertson, Anschutz, Schneid & Crane, LLC
PA I.D. 314532
10700 Abbott's Bridge Rd., Suite 170
Duluth, GA 30097
Telephone: 973-575-0707
Facsimile: 973-404-8886
Email: cwohlrab@rascrane.com